

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

LINDSEY HARRISON,)	CASE NO. 1:18-CV-01638
)	
<i>Plaintiff,</i>)	JUDGE DONALD C. NUGENT
)	
v.)	
)	
DENONE, LLC, et al.,)	<u>JOINT MOTION FOR APPROVAL OF</u>
)	<u>CONFIDENTIAL SETTLEMENT AND</u>
<i>Defendants.</i>)	<u>FOR DISMISSAL WITH PREJUDICE</u>

Plaintiff Lindsey Harrison and Defendants DenOne, LLC and Erick Martinez (collectively referred to as the “Parties”) respectfully move the Court to approve the Settlement reached by the parties and memorialized in the Confidential Settlement Agreement that will be provided to the Court separately. The Settlement resolves all of the claims Plaintiff asserted or could have asserted against Defendants, including claims under the Fair Labor Standards Act (“FLSA”).

The Parties respectfully submit that the Settlement between Plaintiff and Defendants satisfies the criteria for approval under § 216(b) of the FLSA. The Settlement was achieved following Defendants’ production of time and payroll information to Plaintiff and negotiation between the parties. If approved by the Court, the Settlement will fully and finally resolve all issues between Plaintiff and Defendants.

Provided the Court approves the Settlement, the parties further request that the Court enter an Order dismissing this matter, with prejudice, each party to bear its own costs and fees.

Accordingly, for the foregoing reasons, the Parties respectfully request that the Court approve the Settlement and dismiss this matter by entering the proposed Stipulated Order that is being filed herewith.

Respectfully submitted,

/s/ James L. Simon

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CERTIFICATE OF SERVICE

The foregoing was filed electronically on August 15, 2018, and notice of this filing will be sent by operation of the Court's electronic filing system.

/s/ Brian J. Kelly

Attorneys for Defendants